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EXECUTIVE SECRETARY COUNSEL

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March 6, 1998

HAND DELIVERY

Mr. David Waddell **Executive Secretary** Tennessee Regulatory Authority 460 James Robertson Parkway Nashville, Tennessee 37243-0505

RE: BellSouth Telecommunications Entry into Long Distance

(INTERLATA) Service in Tennessee Pursuant to Section

271 of the Telecommunications Act of 1996

TRA Docket No. 97-00309

Dear Mr. Waddell:

WILLIAM W. FARRIS

HARLAN MATHEWS

TIM WADE HELLEN

G. RAY BRATTON JOHN MICHAEL FARRIS

RONALD LEE GILMAN

HOMER BOYD BRANAN, III

EDWIN DEAN WHITE, III CHARLES B. WELCH, JR.

O. DOUGLAS SHIPMAN D. EDWARD HARVEY

REBECCA PEARSON TUTTLE EUGENE STONE FORRESTER, JR

> Enclosed for filing, please find the original plus thirteen (13) copies of the Data Requests of Time Warner Communications of the Mid-South, L.P. to BellSouth Telecommunications, Inc., to be filed in the above referenced proceeding. Copies are being served on parties of record.

> If you have any questions or concerns with regard to this filing, please do not hesitate to contact me.

> > Very truly yours,

FARRIS, MATHEWS, BRANAN & HELLEN, P.L.C.

CBWir:cg

encs:

cc: Parties of Record Carolyn M. Marek C:\DATA\CBW\271\WADDELL.306

REC'D TN RUBULATORY AUTH.

BEFORE THE TENNESSEE REGULATORY AUTHORIM 6 AM 11 21 NASHVILLE, TENNESSEE

IN RE: BELLSOUTH

OWELL DOWNHE EXECUTIVE SECRETARY

TELECOMMUNICATIONS ENTRY INTO LONG DISTANCE (INTERLATA) SERVICE IN TENNESSEE PURSUANT TO SECTION 271 OF THE TELECOMMUNICATIONS ACT OF 1996

DOCKET NO. 97-00309

DATA REQUESTS OF TIME WARNER COMMUNICATIONS OF THE MID-SOUTH, L.P. TO BELLSOUTH COMMUNICATIONS, INC.

Comes now, Time Warner Communications of the Mid-South, L.P. ("Time Warner") pursuant to Tennessee Code Annotated Section 4-5-311 and Rules 33 and 34 of the Tennessee Rules of Civil Procedure and submits these data requests and requests for production of documents to BellSouth Telecommunications, Inc. to be answered on or before March 13, 1998.

In the event the information is not available in the specific format requested, either in part or in total, please provide the information requested in the format maintained in the ordinary course of business. If the following requested information, data or documents are not available for your Tennessee operations specifically, provide the information, data or documents that includes your Tennessee operations.

All data requests are continuing in nature, and, should any circumstances relating to the subject covered thereby change during the pendency of this proceeding, please notify the TCTA immediately of such changed circumstances.

REQUEST NO. 1: Please provide any and all available information relative to the measurements for the following five categories: (1) service provisioning and

maintenance; (2) interim number portability; (3) directory assistance; (4) line identification database ("lidb"); and (5) customer service records, which has been assimilated, recorded and/or reported pursuant to Amendment No. 1 to the Master Interconnection Agreement between BellSouth Telecommunications, Inc. and the Time Warner affiliates.

RESPONSE:

REQUEST NO. 2: Please explain in detail how the information provided in Request No. 1 was produced, collected and maintained for the Time Warner affiliates, all other competing local exchange carriers, and BellSouth's end-user, retail customers.

RESPONSE:

Respectfully submitted,

FARRIS, MATHEWS, BRANAN & HELLEN, P.L.C.

Charles B. Welch, Jr., #5593

Attorney for Time Warner Communications

of the Mid-South, L.P.

511 Union Street, Suite 2400

Nashville, Tennessee 37219

(615) 726-1200

CERTIFICATE OF SERVICE

I, Charles B. Welch, Jr., hereby certify that I have served a copy of the foregoing Data Requests of Time Warner Communications of the Mid-South, L.P. to BellSouth Telecommunications, Inc. on the parties listed below, by depositing copy of same in the U.S. Mail, postage prepaid, this the 6th day of March, 1998.

Charles B. Welch, Jr.

C:\DATA\CBW\271\DATA-REQ.WPD

SERVICE LIST - DOCKET NO. 97-00309

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